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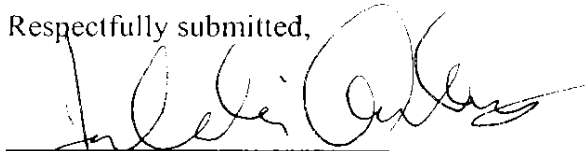
Ms. Marlene H. Dortch  
Office of the Secretary  
445 Twelfth Street, SW, TW-A325  
Washington, D.C. 20554

Re: Petition *for* Rule Making (MB Docket No. 02-301)  
Supporting Comments for Broken Bow, OK

Dear Ms. Dortch:

Enclosed is an original and four (4) copies each of Petitioner's Comments for Broken Bow, Oklahoma.

Respectfully submitted,



Jeraldine Anderson  
1702 Cypress Drive  
Irving, Texas 75061  
(972) 445-3523      Tele

brokenbowgov

014  
11/18/02

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
Amendment of 73.202 (b)	)	MB Docket No. 02-301
Table of Allotments	)	RM-I 0578
FM Broadcast Stations	)	
(Broken Bow, OK)	)	

To: John Karousos, Assistant Chief  
Audio Division of the  
Media Bureau

PETITIONER's COMMENTS

1. Petitioner respectfully submits that the public interest would be served by allocating Channel 232A to Broken Bow, Oklahoma, as that community's first competing commercial FM service. Broken Bow is an incorporated city with a population of over 4,500 people. Broken Bow has its own city manager, Larry Bauchman, its own fire department, its own post office, its own school district, its own city hall and a number of local churches. The proposed channel **232A** will provide additional diversity and an outlet for local self-expression to Broken Bow residents and therefore is in the public interest

2. **As** the Commission is aware, this is one of a number of petitions filed by this Petitioner and other like-minded petitioners. The purpose of filing such petitions is to seek allotments to relatively small communities which are sufficiently removed from major metropolitan areas that there is no prospect that the allotment is merely a step to inaugurate still another facility serving a major broadcast market. These petitions seek allotments to relatively small communities in their own right. For reasons stated above,

the instant petition merits the requested allotment under established principles in Section 307(b) of the Communications Act.

3. The filing of a number of similar petitions has its genesis in the recent development in radio broadcasting of Localized Network Programming. This is a concept that has been developed by the major broadcasters for essentially mid to major markets. It is an approach that provides the economy of a network but the feel and appearance of local programming. The belief of the Petitioner and like-minded petitioners is that such a plan will work with small market communities on a regional basis. Given a geographical area, such as Eastern Oklahoma, Western Oklahoma, North East Texas, West Texas, South Texas, etc., the licensees of FM stations in small communities of a given region – whether the petitioners themselves or other licensees who might successfully outbid them for the license – could initiate unique network programming designed specifically for that region and additionally provide localized community inserts, such as local weather, local events, programming from specific remote locations, regional-specific news, public affairs, public service announcements, promotions and other programming giving life to the commission's policy favoring localism in broadcasting. While there would be local sales, the focus would also be in regional network sales, drawing on the advantages of advertising to the region and the unique nature of the region.

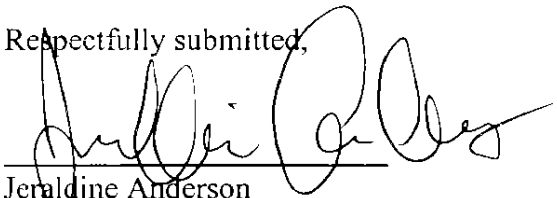
4. The vision is that providing radio service to an area of, say, 5,000 people may not allow for the operation of a traditionally run radio station. However, a network of ten stations in an identifiable geographic area covering, say, 50,000 people could very well be economically viable. This concept is an approach to providing radio service to

clusters of stations in small communities in the nature of modern radio developed by the major group owners for mid and large markets. Such a concept – in lieu of allotting the frequencies to communities in or adjacent to major radio markets – provides a further public interest reason in support of the Petition under Section 307(b).

5. Should this petition be granted, and Channel **232A** be allotted to Broken Bow, Oklahoma Petitioner will apply for Channel 232A, and after it is authorized, will promptly construct the new facility.

The factual information provided in these Comments is correct and true to the best of my knowledge

Respectfully submitted,



Jeraldine Anderson  
1702 Cypress Drive  
Irving, Texas 75061  
(972) 445-1523 Tele

cc: Gene A. Bechtel, Law Office of Gene Bechtel, suite 600, 1050 17<sup>th</sup> Street, N.W., Washington, D.C. 20036, telephone (202) 496-1289, telecopier (301) 762-0156, attorney for the Petitioner. It is requested that the Commission and any parties who may file pleadings in the captioned matter serve copies to Mr. Bechtel as well as the Petitioner.

November 7, 2002

brokenbowpetitioners